

REMARKS

Applicants request reconsideration and allowance of the present application in view of the foregoing amendments and the following remarks.

Claims 1, 3, 4, 6, 9-23, 26-28, 30, and 34 are pending in the present application. Claims 1, 22, 26, 24, and 34 are the independent claims.

Claims 1, 22, 26, 27, and 34 have been amended. No new matter has been added.

Claims 1, 3, 4, 6, 9-23, 26-28, 30, and 34 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,224,216 (Parker et al.) in view of U.S. Patent No. 6,288,815 (Lambert) and U.S. Patent No. 6,594,090 (Kruschwitz et al.). All rejections are respectfully traversed.

Independent claim 1 recites, inter alia, a scrolling unit having at least two discrete cylinder lenses spirally arranged to form at least two spiraling cells respectively corresponding to the at least two discrete cylinder lenses on a single disk.

Independent claim 22 recites, inter alia, separating emitted light beams into a plurality of color beams and scrolling the color beams by rotating an optical element arranged so that rotation thereof simulates linear movement of the optical element, the optical element having at least two discrete cylinder lenses spirally arranged to form at least two spiraling cells respectively corresponding to the at least two discrete cylinder lenses on a single disk.

Independent claim 26 recites, inter alia, separating emitted light beams into a plurality of color beams and scrolling the color beams by rotating an optical element arranged so that rotation thereof simulates linear movement of the optical element, the optical element having at least two discrete cylinder lenses spirally arranged to form at least two spiraling cells respectively corresponding to the at least two discrete cylinder lenses on a single disk.

Independent claim 27 recites, inter alia, a scrolling unit ... having at least two discrete cylinder lenses spirally arranged to form at least two spiraling cells respectively corresponding to the at least two discrete cylinder lenses on a single disk.

Independent claim 34 recites, inter alia, a scrolling unit having a pair discrete cylindrical lenses spirally arranged to form at least two spiraling cells respectively corresponding to the pair of discrete cylinder lenses on a single disk.

However, Applicants respectfully submit that none of the asserted citations teaches or suggests at least the aforementioned features of independent claims 1, 22, 26, 27, and 34. Thus, without conceding the propriety of the asserted combinations, it is respectfully submitted

that the asserted combinations are likewise deficient.

The Office Action acknowledges that Lambert, in FIG. 7b thereof, shows a single cylindrical lens structure that spirals around itself. (Office Action, pages 7 and 8, for example). This teaching is confirmed by Lambert's written description of FIG. 7b, which explains that FIG. 7b illustrates "a tangentially oriented cylindrical lens structure 33 on a disk 32." (Lambert, Col. 10, line 66 – Col. 11, line 1). The Office Action contends that FIG. 7b shows that the single cylindrical lens structure forms "what looks like to be multiple cells." (Office Action, page 8). However, without conceding the propriety of the Office's contention, it is respectfully submitted that Lambert does not teach at least two spirally arranged lens cells formed by and respectively corresponding to at least two discrete cylindrical lenses. Rather, as previously asserted, Lambert merely teaches a single lens (not at least two or a pair) which spirals around itself to form what the Office characterizes as "what looks like to be multiple cells." (Office Action, page 8). Indeed, because Lambert has only one lens, it cannot have at least two spirally arranged cells respectively corresponding to at least two discrete cylindrical lenses or a pair of discrete cylindrical lens cells. Even assuming arguendo that the Office's characterization of Lambert is not incorrect, Lambert would at best teach two cells corresponding to a single cylindrical lens structure.

Accordingly, favorable reconsideration and withdrawal of the rejection of the independent claims under 35 U.S.C. § 103 are respectfully requested.

In view of the foregoing, Applicants respectfully submit that the independent claims patentably define the present invention over the citations of record. Further, the dependent claims should also be allowable for the same reasons as their respective base claims and further due to the additional features that they recite. **Separate and individual consideration of the dependent claims is respectfully requested.**

Applicants submit that this Amendment clearly places the subject application in condition for allowance. This Request was not earlier presented because Applicants believed that the prior Amendment placed the subject application in condition for allowance. Accordingly, entry of the instant Amendment as an earnest attempt to advance prosecution and to reduce the number of issues is requested under 37 C.F.R. § 1.116.

Applicants believe that the present Amendent is responsive to each of the points raised by the Examiner in the Official Action. However, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to such

matters.


There being no further outstanding objections or rejections, it is submitted that the present application is in condition for allowance. An early action to that effect is courteously solicited.

If there are any additional fees associated with filing of this Request, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: 8-17-06

By: 
Michael E. Kondoudis
Registration No. 42,758

1201 New York Avenue, NW, Suite 700
Washington, D.C. 20005
Telephone: (202) 434-1500
Facsimile: (202) 434-1501